

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No.: 19-10063-DJC
)	
RANDALL CRATER,)	
)	
Defendant.)	

ASSENTED-TO MOTION FOR EXCLUSION OF TIME UNDER THE SPEEDY TRIAL ACT

The United States of America respectfully moves the Court to exclude the time period from December 14, 2020 through and including September 13, 2021, from the speedy trial clock, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), on the ground that the ends of justice served by excluding this period outweigh the public and defendant's interest in a speedy trial.

In support, the government states that on December 16, 2020, an Interim Status Conference occurred during which the Court asked the parties to confer and submit a proposed trial date in the summer or early fall 2021. The parties subsequently proposed a trial date of September 13, 2021.

The time period between December 14, 2020 through and including September 13, 2021 will allow defense counsel, who was recently appointed and still reviewing the evidence in the case, the opportunity to continue his review discovery and consult with his client to determine how to proceed. Thus, this period constitutes "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence," and the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, Speedy Trial Act, §§ 3161(h)(7)(A) and (B)(iv).

Respectfully submitted,

ANDREW E. LELLING
UNITED STATES ATTORNEY

Date: December 23, 2020

By: /s/ Jordi de Llano
Jordi de Llano
Assistant U.S. Attorney

/s/ Caitlin R. Cottingham
Caitlin R. Cottingham
Trial Attorney

CERTIFICATE OF SERVICE

I, Jordi de Llano, hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: December 23, 2020

/s/ Jordi de Llano
Assistant United States Attorney